

IOWA COLLEGE STUDENT AID COMMISSION

Hannibal—LaGrange University Application for Postsecondary Registration Renewal November 2014

STAFF ACTION:

Approve Hannibal-LaGrange University's request for registration renewal in Iowa for a two-year term that begins retroactively on September 27, 2013, and ends on September 27, 2015.

Registration Purpose

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Hannibal-LaGrange College (HLGU) applied for registration renewal to continue offering postsecondary education programs at physical location in Keokuk, Iowa. The University also offers distance education programs, at least one of which includes a structured practicum that an Iowa resident would participate in at an Iowa location.

Institutional Information

Hannibal-LaGrange University is a private non-profit institution whose main campus is located at 2800 Palmyra Road, Hannibal, Missouri. As noted above, the institution also maintains an instructional site at 335 Messenger Road, Keokuk, Iowa. The school's chief executive officer is Dr. Anthony Allen, 2800 Palmyra Road, Hannibal, Missouri. Its full-time Iowa program coordinator and Iowa contact person is Monica Winkler, 8 Suncrest Terrace, Keokuk, Iowa. The University is not registered with the Iowa Secretary of State as a corporation conducting business in Iowa, and the Commission cannot require that it do so.

Physical Facilities: HLGU has a long-standing, verbal agreement in place with (Iowa) Southeastern Community College to utilize space at the Community College's Keokuk, Iowa location for instruction in its Iowa-based, on-ground programs. The Community College does not charge the University for the use of its classrooms.

Accreditation: Hannibal-LaGrange University is accredited by the Higher Learning Commission (HLC), a regional accrediting agency recognized by the federal Department of Education. The University is approved by the HLC to operate at the additional location in Keokuk, Iowa.

Federal Stafford Loan 3-year Cohort Default Rate (FFY 2011): 8%

For comparison purposes, the FFY 2011, 3-year national average cohort default rate is 13.7%.

Graduation Rate: 66%. This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported to the federal Department of Education.

Average Loan Debt upon Graduation: \$19,302.29 (all loan types, including private loans).

Record Preservation: The Registrar's office is the keeper of student records. Older records are paper, but also have been scanned to microfiche. Remaining paper and microfiche records are secured behind two sets of locks in the Administration Building. The University is investigating electronic systems options to archive all remaining paper and microfiche documents and plan to have this process complete in the next two to three years. Newer records are electronic, regularly backed up, and stored off site.

Transcript Requests: Any current or former student may request a transcript by contacting:

Beth Crum
Hannibal-LaGrange University
2800 Palmyra Road
Hannibal, Missouri 63401
(573) 629-3046
<http://www.hlg.edu/academics/downloads/transcriptrequest.pdf>

Instructional Methodology: At the Keokuk, Iowa instructional site, students receive in-person, classroom instruction.

Online program students must complete an online library tutorial prior to beginning each online course. HLGU also provides online tutorials in the use of the University's online learning platform at <http://content.learninghouse.com/training/student-tutorials/tutorial.html>. The associate director of online learning is available if students require additional assistance.

Most online courses are organized with weekly chat sessions that require all students to be online with the instructor at the same time (synchronous) as well as discussion postings and other elements that can be done at times chosen by each student (asynchronous). In an eight-week course a student should expect at least eight synchronous sessions. Online courses require attendance at any scheduled chat times, participation in discussion threads, and submission of all assignments and evaluations according to the schedule in the syllabus. Students will engage with classmates through the discussion boards within the course. For instance, the instructor might pose a topic for the week's discussion and then each student will be expected to offer his or her views on the topic and respond to each other by means of postings to a discussion board feature of the course. In some cases students may be organized into discussion or project groups in which the interaction will be only with group members instead of the whole class. Some tests may be given, but courses will usually have a number of graded elements such as papers, projects, and reports that can be used in evaluating the student's progress. The tests that are used are administered online and instructors determine the format.

Student Learning Resources: The University's Roland Library resources are accessible to students attending the University's Keokuk instructional site and to online program students through the student's online student portal. Online and Keokuk site students follow the same materials check-out policies and fees as on-campus students, except that materials normally loaned to students for three days will receive an extended loan period depending upon the mode of transportation and any associated, additional delivery time.

Hannibal-LaGrange University students have online access to any participating MOBIUS library. MOBIUS is a consortium of approximately 62 Missouri libraries that include the University of Missouri Libraries, the Missouri State Library, and an open-source, integrated system of public libraries called Missouri Evergreen. The MOBIUS Union Catalog includes more than 27 million items. Participating libraries are listed at <http://searchmobius.org/screens/libinfo.html>. The MOBIUS catalog is available at <http://searchmobius.org/search/>.

Additional library resources include the following:

- For searching for HLGU books, the HLGU Online Catalog at <http://lance.missouri.edu/search~S2/>. HLGU will mail books to the student's home. A student who is not near a participating MOBIUS library may wish to request books only from HLGU to reduce the time frame between request and receipt.
- Students outside Missouri may wish to use the WorldCat Database and request interlibrary loans through a local library. Students should check with their local library on procedures and delivery times. Students should allow three to four weeks for delivery if the request is being sent through HLGU and the item is being delivered via the U.S. postal system.
- Magazine articles can be accessed online through EBSCOhost, ERIC, LEXIS-NEXIS, and other databases.
- Articles not available through one of the full-text databases may be requested online through Article First or ECO in FirstSearch, or they may be requested from the HLGU library via email.
- Questions about references and other matters may be directed to the HLGU library staff at library@hlq.edu.

For questions and assistance, library hours are:

- September through April: Monday – Friday 7:30 am - 12 am; Saturday Full Service 12 pm - 5 pm
- May through August: Mon., Tue., Thurs. 8 am - 6 pm; Wednesday 8 am - 5 pm; Friday 8 am - 4 pm; Saturday Closed

Online portal technical assistance is available from the University Help center by dialing toll-free 866-259-4329.

HLGU's Academic and Career Services Office provides student support including tutoring, information about building study skills, creating resumes, and exploring careers. Online tutorials and information resources are available at <http://www.learningexpresshub.com/center-featured-resources> to assist students with math, reading, writing, and science skills, preparing for examinations, learning about specific careers, and searching for jobs.

Curriculum Evaluation and Development: HLGU maintains a formal policy and process for academic program proposals that is designed to guide all department or division faculty members in the proposal of new academic programs and majors. When a department proposes curriculum changes in a present program, many of the steps below must be followed, but in a less ambitious format.

The process for the development and approval of a new program proposal typically takes at least one academic year. This includes (1) the process of researching and developing the proposal, (2) the obtaining of the internal approvals, and (3) the process for gaining external approvals. Internal approvals include the Board of Trustees which only meets twice a year. This approval must be obtained before the applications can be submitted for external approvals. At least six months must be reserved for the third stage, external approval, which includes three months for (Missouri) State Board of Education approval and three months for NCA Higher Learning Commission approval.

Development and approval of new programs necessitates the following steps:

1. Verbal Discussion. The department chair (department faculty members may also attend) may request a meeting with the Vice President for Academic Affairs (VPAA), and any deans or campus officials that the VPAA selects, for a preliminary discussion.

2. Submission of a letter of intent. A letter of intent to the VPAA should briefly make the case for the program and should include the following:

- a. Approval by department.
- b. Description of program.
- c. Rationale (including how the program contributes to the mission of the University)
- d. Potential student population to be served by program.
- e. Identify similar competing educational programs offered (regionally, online nationally, etc.).
- f. Name(s) of the person who will write the proposal.

3. Provisional Approval. The VPAA will seek provisional approval from the President's Executive Cabinet and the Academic Affairs Committee (AAC) to proceed with development of a full proposal.

4. Preparation of a Formal Written and Dated Proposal. The proposal will be prepared by the academic department that will submit the proposal.

5. Approval Process. A full proposal is submitted for approval as follows:

- a. Department chair submits to the VPAA to be certified for completeness.
 - i. After the VPAA approves the proposal, it cannot be changed by the department.

- (1) If the department finds it necessary to change the proposal, it must formally request to withdraw the proposal.
 - (2) The process must begin again with step 1 above, the verbal discussion with the VPAA.
- b. Upon the VPAA approval, the department chair submits the proposal to the division chair for division approval.
 - i. Division approval must be more than a mere stamp of approval. The approval process should be conducted fully and carefully.
 - ii. If the division chair has questions or the division faculty raises questions, they may refer these to the VPAA for consideration and for discussion with the submitting department or faculty.
 - c. Upon division approval, the division chair submits the proposal to the AAC for approval.
 - i. The AAC minutes must record the process of approvals from the department to the division to the AAC.
 - ii. Since the recommendation for the approval will come from a committee of faculty (the division), it will not need a motion and a second to be considered by the AAC as a committee recommendation.
 - d. Upon ACC approval, the VPAA submits the proposal to the Executive Cabinet.
 - e. Upon Executive Cabinet approval, the VPAA submits the proposal to the Board of Trustees.
 - f. After the Board of Trustees approval, the external applications may begin for approvals.
 - i. The approval of the Missouri Board of Higher Education — the Coordinating Board for Higher Education (CBHE). This approval is needed before applying to the next step.
 - ii. The NCA Higher Learning Commission.
 - iii. Any specialized accrediting agency relevant to the academic program.

Student Complaints Process: The University maintains complaint or grievance processes that are specific to grades and the quality of academic instruction. These are outlined in the Student Handbook.

For other types of complaints, the University urges the student to first initiate an informal discussion. If that informal discussion does not lead to a resolution, the student may submit a written, signed, and dated complaint within 10 working days after the event leading to the complaint.

The student should follow these procedures until a resolution is reached:

1. Appeal to the University faculty or staff member's immediate supervisor.
2. Appeal to the appropriate vice president or administrative dean if the grievance remains unresolved after a reasonable period of time. Appropriate contact information is provided in the University's complaint procedures at the link below.
3. Appeal to the University President if the student is not satisfied with the disposition of the grievance.
4. If the grievance continues to remain unresolved after the above steps have been taken, appeal to the Board of Trustees, which is the final institutional arbitrator in such matters.

The University discloses its complaints process and more information about the University officials and offices to which a student should direct specific types of complaints at http://www.hlg.edu/newsinfo/downloads/consumer/HLGU_Complaint_Process.pdf?ts=3423.

On-Ground Programs Offered in Iowa

The total, estimated cost of tuition, fees, books and supplies for each program is listed below.

Undergraduate Degree Completion Programs

- Bachelor of Science in Social Work (non-licensure):* \$21,105
- Bachelor of Science in Organizational Management: \$21,105
- Bachelor of Science in Criminal Justice: \$21,105

Distance Education Programs Offered In Iowa

The total, estimated cost of tuition, fees, books and supplies for each program is listed below. .

Undergraduate Degree Programs

- RN to BSN degree completion program:* \$14,111

Graduate Degree Programs

- Master of Arts in Leadership: \$11,046
- Master of Science in Education (non-licensure): \$11,046

**Field Experience:*

- The RN to BSN program requires the student to complete a field experience under the supervision of a preceptor as part of his/her capstone course. This course is three credits for a total of 90 practicum hours. This is further broken down into 30 hours of online class and 60 hours of hands on project work. Students will integrate knowledge of nursing research, leadership and management, and nursing theories to design, implement, and lead a project that will improve client outcomes. The practicum will be designed in collaboration with a faculty member and carried out in an appropriate health care or community based care setting under a preceptor. BSN practicum preceptors are experienced RN's employed by clinical agencies in professional staff or leadership positions. The preceptor must have an earned BSN degree or higher and be licensed as an RN at or above the level for which the student is preparing.
- The Bachelor of Science in Social Work requires a student to complete 12 credit hours of supervised internship. Preceptors are practicing social workers with a Master of Social Work.

Registration Compliance

As required by Iowa Code Section 261B.4, Hannibal-LaGrange University disclosed its institutional policy for refunding tuition charges to students who withdraw from its programs.

Iowa registration law and rule does not govern the University's tuition refund policy because it is not a for-profit institution.

Administrative rules specifically require the school to comply with the requirements of Chapter 261.9(1) "e" through "h".

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. These requirements duplicate policies and disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. The University complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), and discloses these policies to students in the following:
 - ✓ The University's Student Handbook <http://www.hlg.edu/campuslife/downloads/student-handbook.pdf>.
 - ✓ The University's Annual Fire Safety and Security Report https://www.hlg.edu/campuslife/public-safety/downloads/2013_PublicSafety_AnnualReport.pdf?id=1.
 - ✓ The University's Public Safety web page <http://www.hlg.edu/campuslife/public-safety.php>.
- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy concerning institutional charges for members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. During the registration application review process, the University adopted this policy and discloses it to students in the ADVANCE Department Student Guide, which is given to each student at the time of orientation.
- Iowa Senate File 2225 created a new Iowa Code Section 261.9(1)(h). This new law, generally effective July 1, 2012, requires a school to develop and implement a policy requiring employees, who in the course of their employment, attend, examine, counsel, or treat a child to immediately report suspects incidents of child physical and sexual abuse to law enforcement and to the school. By cross-reference to existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to schools that have an instructional site in Iowa. During the registration application review process, the University adopted this policy as it applies to personnel at the Keokuk, Iowa, instructional site. The policy is provided to students, adjunct faculty and other Keokuk site representatives in the ADVANCE Department Student Guide.

Student Consumer Information: In its registration application, the University affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires a school to disclose to students information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the

identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school that participates in the federal student aid programs and the University discloses them in its catalog <http://www.hlg.edu/academics/catalog.php>.

HLGU affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. Effective July 1, 2012, these provisions of Iowa Code were modified to state that, provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The University will provide this information to Iowa-resident students in its ADVANCE Program Student Guide, which is provided to each student at the time of orientation.

Financial Responsibility: The University submitted a copy of an independent audit conducted by Wade Stables, P.C., Certified Public Accountants, dated September 26, 2012, for the institutional fiscal year that ended June 30, 2012. The auditing firm's report notes that all fixed assets acquired before June 30, 1989 have been recorded at appraised values as of June 30, 1989 due to a fire that occurred June 22, 1989 which destroyed equipment and buildings at the University. In addition, no depreciation was recorded on any assets until June 30, 1994. The auditing firm expressed its opinion that, except for the effects of recording fixed assets as previously noted and the recording of related depreciation, the financial statements of the University present fairly, in all materials respects, the financial position of the University. The auditor found no significant deficiencies and no instances of noncompliance material to the University's financial statements.

- A private non-profit institution that participates in the federal student aid programs must maintain a composite score, based on a three factor financial responsibility ratio, of at least 1.5 in order to be determined "financially responsible" without additional oversight. The independent auditors' report states that the University's composite score for the institutional fiscal year ending in 2012 was 1.5 (out of a possible 3.0).
- The institution is not required to calculate the percentage of its revenue derived from federal student aid funds since it is not a for-profit institution.

Full-Time Iowa Resident Faculty Member or Program Coordinator: The University employs a full-time program coordinator at its Keokuk, Iowa instructional site, Monica Winkler. Ms. Winkler has a Bachelor of Science degree in Organizational Management from HLGU.

Ms. Winkler is also employed full-time as a Business Manager at the Keokuk Public Library. Therefore, staff investigated whether the University could justify Ms. Winkler's concurrent, full-time employment as the Keokuk, Iowa program coordinator.

The HLGU Vice President of Business and Finance reports that Ms. Winkler is a salaried employee who is considered full time. HLGU reports that any employee who works at least 30 hours per week is considered to be employed full time. The HLGU Employee Handbook <http://www.hlg.edu/newsinfo/downloads/EmployeeHandbook.pdf?ts=32423> lists benefits that are available only to its full-time employees, i.e., those that work at least 30 hours per week. These benefits include time off with pay for designated holidays, paid vacation time, paid sick leave, life insurance and health insurance. Ms. Winkler receives all of the benefits that HLGU

grants, under its personnel policies, to a full-time employee. HLGU reports that Ms. Winkler interacts with students and others in the course of her job duties exclusively in the evenings and on weekends due to the nontraditional nature of the student body and the nontraditional timeframes and format in which the University offers programs at the Keokuk site. Ms. Winkler's duties include the following:

- Completing the enrollment process for each student each term in the evening when classes are scheduled.
- Advising students about their degree completion plan.
- Recruiting students and faculty members.
- Attending classes to answer student questions and assist students with any issues that may arise.
- Coordinating with the University's main campus to determine the most efficient means of marketing the University's Keokuk-based programs via newspaper and radio.
- Coordinating class schedules with the University's host Southeast Community College to avoid conflicts in classroom availability.
- Working with adjunct faculty to ensure they have correct and current curriculum and texts for each class.
- Communicating and supporting the University's policies and rules for students.

HLGU reports that during Ms. Winkler's employment, the level of interaction and coordination she has developed between Keokuk site students and faculty, as well as with the University's Hannibal, Missouri main campus, has eliminated the need for administrative staff from the University's main campus to travel to the Keokuk site.

Instructional/Supervisory Staff Qualifications: The University provided resumes of 12 instructors at the Keokuk instructional site, and staff accessed an additional 15 web-based profiles for faculty members who provide instruction in its online programs. Of 27 faculty members reviewed:

- Education: Of four faculty members whose educational credentials are identified, all four have a doctoral degree. Additional information about work experience is not available.
- General Education: This faculty member has a Master of Arts in Mathematics. She is a long-standing, licensed mathematics instructor in the Missouri public school system, and is an adjunct mathematics instructor at a Missouri community college.
- Criminal Justice: Three faculty members have a master's degree in justice administration, psychology, or public administration. These individuals also have significant professional experience in the administration of law enforcement and corrections. One faculty member has a baccalaureate degree in justice administration, experience in law enforcement training, and work experience as an Assistant Police Chief and Chief of Police.
- Nursing: Of the ten faculty members identified on the University's website in association with the RN to BSN program, all but two have a master of science in nursing degree. The remaining two faculty members have a bachelor of science in nursing degree. All faculty members are licensed, registered nurses. Expertise among these faculty members includes home health care agency administration, postpartum care, neonatal intensive care, medical-surgical, mental health, emergency room and critical care, cardiopulmonary nursing, and nursing education.

- **Organizational Management/Leadership:** Of the six faculty providing instruction in this general topical area, one has a juris doctor and a master's degree in urban and regional planning. The remaining five faculty members have a master's degree in business administration. Work experience among the six faculty members includes positions as a company Chief Executive Officer, business director, business materials planner and purchaser, sales manager, marketing manager, chief operations officer, environmental, health and safety director, nonprofit organization manager, and a trainer for company managers and leaders.
- **Social Work:** The two faculty members reviewed have master's degrees in marriage and family counseling and sociology. Additional information about their work experience was not available.

Commitment to Iowa Students and Teach-Out: The HLGU registration renewal application includes a letter from President Anthony Allen affirming the University's commitment to continuing to provide its programs to Iowa residents. If at a future time the University were unable to continue its programs, Dr. Allen commits to providing a teach-out to ensure completion for those students already in the program, or the University would find an alternative for students to complete their programs at another institutions.

Student Complaints: None.

Compliance with Iowa Code Chapter 714

Section 714.18 – Evidence of Financial Responsibility

HLGU has filed satisfactory evidence of financial responsibility, including a continuous corporate surety bond payable to the State of Iowa in the amount of \$50,000. The company that issued the bond is Foster Financial Group, LLC.

Section 714.23 – State Tuition Refund Policy

The Iowa tuition refund policy does not apply to HLGU because it is not a for-profit institution.